

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN THE MATTER OF:

DILIP JANA
Plaintiff,

v.

WALMART, INC.
Defendant.

Civil Action No. 4:24-cv-00698-SDJ-BD

FILED

JUL 28 2025

CLERK, U.S. DISTRICT COURT
TEXAS EASTERN

Plaintiff's Supplemental Notice Regarding July 18, 2025 Production (Related to Dkt. 87)

Pro Se Plaintiff Dr. Dilip Jana respectfully submits this Supplemental Notice to preserve the record and assert his objections concerning Defendant Walmart Inc.'s July 18, 2025 document production (**EXHIBIT A-1**) , previously addressed in Dkt. 87.

On July 18, 2025, Defendant served Plaintiff with a password-protected ZIP file containing a purported supplemental document production via email, without an accompanying cover letter, certification, or identification of the discovery requests to which it purportedly responded. As noted in Plaintiff's prior filing (Dkt. 87), the production:

- Was not signed or certified under Federal Rule of Civil Procedure 26(g);
- Was transmitted via a non-attorney representative (paralegal), without explanation or reference to the Protective Order (Dkt. 67).

Plaintiff has not opened, reviewed, or accessed the contents of this production until now, due to serious concerns regarding procedural irregularity, evidentiary integrity, and the risk of tampering. Plaintiff expressly reserves all objections under Rules 26(g), 33, and 37, and does not concede the authenticity, completeness, or admissibility of any document within the July 18, 2025 production.

Plaintiff now intends to access the production solely for the limited purpose of identifying and preserving potential evidence of document manipulation, metadata spoliation, or procedural misconduct.

On July 21, 2025, Plaintiff sent a written request to Walmart's lead counsel seeking clarification regarding the basis, scope, and procedural compliance of the July 18 production. Plaintiff specifically inquired whether the documents were designated as confidential, what discovery requests (if any) the production purported to fulfill, and why no certification or signature under Rule 26(g) accompanied the production. Despite receiving a response on July 24, 2025, Walmart declined to answer these substantive questions, instead referring vaguely to file transfer mechanics. Plaintiff reiterated that the deficiencies were not technical but legal in nature and advised that he could not access the files without compromising rights or evidentiary integrity. These communications are attached hereto as **EXHIBIT A-2.**

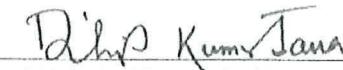
Plaintiff further notes that the validity and procedural integrity of the July 18, 2025 production are central to some of Plaintiff's pending motions including but not limited to Dkt. 90 (Emergency Referral to FBI), Dkt. 94 (Motion to Strike July 18 Production and for Sanctions), and Dkt. 95 (Motion to Strike Dkt. 88). This Notice is therefore submitted not only to preserve Plaintiff's rights

under the Federal Rules of Civil Procedure, but also to ensure an accurate and complete record in connection with those motions.

This Notice is submitted to ensure full transparency, to avoid any implied waiver or procedural estoppel, and to preserve Plaintiff's objections and claims regarding Defendant's improper conduct surrounding the July 18 production. Plaintiff reserves all rights to raise further objections, including those relating to the timing, purpose, and procedural context of the July 18 production, which may bear on future motions for appropriate judicial relief.

Dated: July 28, 2025

Respectfully Submitted,


Dilip Jana
DILIP JANA, Plaintiff
Pro Se
Telephone : 318-243-9743
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800 Fairlawn St, Allen, TX, 75002

CERTIFICATE OF SERVICE

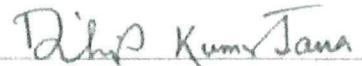
On July 28, 2025, a true and correct copy of the foregoing was served upon the following through the Court's CM/ECF system:

Peter S. Wahby Texas Bar No. 24011171 Peter.wahby@gtlaw.com	Morgan E. Jones Texas Bar No. 24132301 Morgan.jones@gtlaw.com	Holmes H. Hampton Texas Bar No. 24144019 holmes.hampton@gtlaw.com
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ATTORNEYS FOR DEFENDANT WALMART INC.

Dated: July 28, 2025

Respectfully Submitted



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